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**Attorney for Defendant**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**Case No. 3:12-cr-00373-HZ-3**

**Plaintiff,**

**DEFENDANT'S UNOPPOSED MOTION  
TO CONTINUE TRIAL DATE**

**v.**

**ANTONIO EQUIHUA-RAMIREZ,**

**Defendant.**

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Defendant Antonio Equihua-Ramirez, through his attorney, Patrick J. Ehlers, moves this Court to continue the trial in the above-entitled case, which is presently scheduled for June 4, 2013, for a period of approximately 60 days, to August 6, 2013, or a date thereafter convenient to the Court. This motion is unopposed by Assistant United States Attorney Kathleen Bickers. This is Mr. Equihua-Ramirez's fourth request for a continuance.

It is anticipated that Mr. Equihua-Ramirez will request the Court strike the trial date and enter a change of plea prior to August 6. Undersigned counsel does not anticipate that Mr. Equihua-Ramirez will proceed to trial.

Mr. Equihua-Ramirez was arraigned on July 26, 2012, and is currently in custody at Columbia County Jail.

This continuance constitutes excludable delay to, August 6, 2013, pursuant to Title 18, United States Code, Section 3161(h)(7)(A). The ends of justice served by granting this motion outweigh the best interests of the public and Mr. Equihua-Ramirez in a speedy trial because the additional time is necessary to defense counsel sufficient time to continue investigation on the case, conduct research, consult with Mr. Equihua-Ramirez, and prepare his case. Mr. Equihua-Ramirez acknowledges his right to a speedy trial under the Speedy Trial Act and agrees that this motion will result in excludable delay under the Act.

Respectfully submitted this May 31, 2013.

/s/ Patrick Ehlers

Patrick J. Ehlers  
Attorney for Defendant